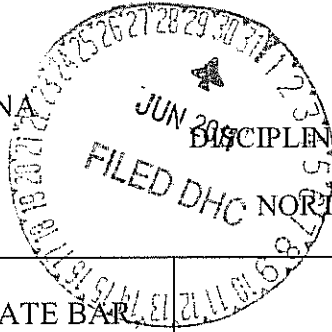


STATE OF NORTH CAROLINA
WAKE COUNTY



BEFORE THE
DISCIPLINARY HEARING COMMISSION
OF THE
NORTH CAROLINA STATE BAR
11 DHC 17

THE NORTH CAROLINA STATE BAR,

Plaintiff

v.

DEBORAH L. WILLIAMS, Attorney,

Defendant

COMPLAINT

Plaintiff, complaining of Defendant, alleges and says:

1. Plaintiff, the North Carolina State Bar ("Plaintiff" or "State Bar"), is a body duly organized under the laws of North Carolina and is the proper party to bring this proceeding under the authority granted it in Chapter 84 of the General Statutes of North Carolina, and the rules and regulations of the North Carolina State Bar promulgated thereunder.

2. Defendant, Deborah L. Williams ("Defendant" or "Williams"), was admitted to the North Carolina State Bar on 20 March 1993 and is, and was at all times referred to herein, an attorney at law licensed to practice in North Carolina, subject to the rules, regulations and Rules of Professional Conduct of the North Carolina State Bar and the laws of the State of North Carolina.

3. During the times relevant herein, Williams actively engaged in the practice of law in the State of North Carolina and maintained a law office in Wilmington, New Hanover County, North Carolina.

4. From at least March 2004, Williams maintained an attorney trust account at RBC Centura Bank bearing account number ending in 1765 (hereinafter "the RBC account") and an attorney trust account at First Citizens Banks bearing account number ending in 0517 (hereinafter "the First Citizens account") into which Williams deposited entrusted client funds.

5. Williams did not identify the client(s) associated with multiple deposits into and withdrawals from the RBC account and the First Citizens account.

6. Williams did not perform quarterly or monthly reconciliations of the RBC account or the First Citizens account.

7. Williams did not maintain proper client ledgers which adequately tracked the deposit and withdrawal of clients' funds in the RBC account and/or the First Citizens account.

8. Williams did not retain complete records pertaining to entrusted funds received by her and deposited into or withdrawn from the RBC account and the First Citizens account, including but not limited to bank statements, bank receipts, wire and electronic transfer confirmations, check stubs, cancelled checks, deposit slips, and withdrawal slips.

9. Between at least March 2004 and the present, Williams failed to promptly disburse multiple clients' entrusted funds held in the RBC account and the First Citizens account.

THEREFORE, the State Bar alleges that Defendant's foregoing actions constitute grounds for discipline pursuant to N.C.G.S. § 84-28(b)(2) in that she violated one or more of the Rules of Professional Conduct in effect at the time of the actions as follows:

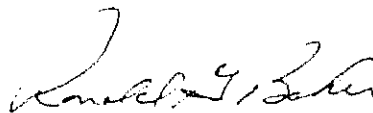
- (a) By failing to identify the clients associated with numerous deposits into and withdrawals from her RBC and First Citizens trust accounts, Williams failed to properly deposit and maintain entrusted funds in her attorney trust accounts in violation of Rules 1.15-2(a), 1.15-3(b)(1) & 1.15-3(b)(2);
- (b) By failing to maintain proper client ledgers and complete and accurate records for general trust accounts, and by failing to perform monthly and quarterly reconciliations of her trust accounts, Williams failed to adequately monitor and maintain her attorney trust accounts in violation of Rules 1.15-3(b)(2), (3), (4) and (5), and Rules 1.15-3(d)(1) and (2); and
- (c) By unnecessarily retaining entrusted funds in her RBC and First Citizens trust accounts, Williams failed to act with diligence and promptness in representing a client in violation of Rule 1.3, and failed to promptly pay or deliver to her clients or to third persons as directed by the clients any entrusted property belonging to the client in violation of Rule 1.15-2(m).

WHEREFORE, Plaintiff prays that:

- (1) Disciplinary action be taken against Defendant in accordance with N.C. Gen. Stat. § 84-28(a) and § .0114 of the Discipline and Disability Rules of the North Carolina State Bar (27 N.C.A.C. 1B § .0114), as the evidence on hearing may warrant;
- (2) Defendant be taxed with the administrative fees and costs permitted by law in connection with this proceeding; and

(3) For such other and further relief as is appropriate.

This the 30th day of June, 2011.



Ronald G. Baker, Sr., Chair
Grievance Committee



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